

LAW OFFICE OF GREGORY JAVARDIAN, LLC
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
Yolanda Warren
Debtor(s)

Chapter 13 Proceeding
20-11732 AMC

**STIPULATION BY AND BETWEEN YOLANDA WARREN AND CITIZENS
BANK, N.A. F/K/A RBS CITIZENS, N.A.**

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Motion for Relief from the Automatic Stay filed by Mary F. Kennedy on behalf of mortgagee, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. ("Movant").

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

1. Movant is a mortgagee and holder of a perfected, secured claim against the Debtor pursuant to a Note and Mortgage on Debtor's real estate known as at 2716 Welsh Road, Philadelphia, PA 19152.
2. Upon approval by the United States Bankruptcy Court of the within Stipulation, Debtor and secured creditor, Citizens Bank, N.A. f/k/a RBS Citizens, N.A., agree to the following:
 - (a) Debtor(s) acknowledges that the current regular monthly post-petition mortgage payment is \$465.47 per month. The monthly payment is

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subject to change in accordance with the terms of the Note and
Mortgage.

- (b) At the time the Motion for Relief from Stay was filed Debtor was due
for the following amounts post-petition:

4/1/2021 Payment	\$465.47
5/1/2021 Payment	\$465.47
7/1/2021 Payment	\$465.47
TOTAL	\$1,396.41

- (c) Since the filing of the Motion for Relief from Stay Debtor(s) has cured
the post-petition payment default and the Debtor is due for the July 1,
2021 post-petition mortgage payment.

- (d) Commencing with the July 1, 2021 payment the Debtor(s) shall
resume and shall continue to make all regular monthly post petition
mortgage payments when they are due in accordance with said Note
and Mortgage.

- (e) All payments from Debtor(s) to Citizens Bank, N.A. f/k/a RBS
Citizens, N.A. its successors and/or assigns shall be in the form of
certified funds or Trustee checks if conduit payments.

- (f) The provisions of the Stipulation do not constitute a waiver by Movant
of its right to seek reimbursement of any amounts not included in this
Stipulation, including fees and costs, due under the terms of the
mortgage and applicable law.


- (g) The Debtor(s) shall timely tender all payments and comply with all
conditions in accordance with this Stipulation. If such payments or

conditions are not timely made, Movant may provide the Debtor(s) and their counsel with fifteen (15) days written notice of default. If the default is not cured within the fifteen (15) day period, Movant may certify the default to this Court and relist a hearing on Movant's request for relief from the stay.

- (h) Should Citizens Bank, N.A. f/k/a RBS Citizens, N.A. its successors and/or assigns be granted relief from the stay after filing a Certification of Default in accordance with paragraph 2(g) above, the parties agree that the said relief order shall include the following language: "bankruptcy Rule 4001(a)(3) is not applicable, and Movant is allowed to immediately proceed with foreclosure and all other relief available under the Non Bankruptcy law."

(i) The parties agree that a facsimile may be submitted to the Court as if it were an original.

STIPULATED AND AGREED TO BY:


Brad J. Sadek, Esquire
Attorney for Debtor, Yolanda Warren

Date: 6/30/21


Mary F. Kennedy, Esquire
Attorney for Citizens Bank, N.A. f/k/a RBS Citizens, N.A.

Date: 6/30/2021

/s/ Jack Miller

Date: 6/30/2021

William C. Miller, Esquire Trustee has no objection to the terms
Trustee without prejudice to any of the Trustee's rights and remedies

On this ____ day of _____, 2021, approved by the Court.

United States Bankruptcy Judge
Ashely M. Chan